UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: JOHN A. HARBAUGH, JR.

No. 1:18-bk-00486-HWV

and AMY L. HARBAUGH

Chapter 13

MOTION TO CONVERT CASE TO CHAPTER 7

AND NOW, this <u>16</u> day of September, 2020, come the Debtors, John A. Harbaugh and Amy L. Harbaugh, by their attorney, Michael J. Krout, Esquire and file this Motion to Convert Case to Chapter 7 of which the following is a statement:

- 1. Movants are John A. Harbaugh and Amy L. Harbaugh, Debtors above-captioned.
- 2. Debtors initially filed their bankruptcy petition under Chapter 11 U.S.C. Chapter 13.
 - 3. Debtors request the conversion of their case to Chapter 7.

Respectfully submitted,

Michael J. Krout, Esquire

1653 Rodney Road

York, Pennsylvania 17408

(717) 850-2519

Supreme Court No. 53810

CERTIFICATE OF SERVICE

I, Michael J. Krout, Esquire, 1653 Rodney Road, York, Pennsylvania, do hereby certify that on this 17 day of September 2020, I served a true and correct copy of Motion to Convert Case to Chapter 7 by depositing the same in the United States mail, First Class, postage prepaid, to all parties identified on the matrix and to:

> Charles J. DeHart III PO Box 7005 Lancaster, PA 17604

By: Michael J. Krout, Esquire

Andrew R. Garcia Bank of America 16001 North Dallas Pkwy Addison, TX 75001-3311

John and Amy Harbaugh 25 Mountain Lane Fairfield, PA 17320-8962

Michael J. Krout, Esquire 1653 Rodney Road York, PA 17408

Phelan Hallinan & Schmieg LLP One Penn Center 1617 JFK Boulevard, Ste. 1400 Philadelphia, PA 19103

PNC Bank 6 N. Main Street Dayton, OH 45402

PRA Receivables Management, LLC P.O. Box 41021 Norfolk, VA 23541-1021

Select Portfolio Servicing, Inc. P.O. Box 65250 Salt Lake City, UT 84165-0250

United States Trustee 228 Walnut Street, Ste. 1190 Harrisburg, PA 17101-1722